

# **Exhibit 11**



Debevoise & Plimpton LLP  
66 Hudson Boulevard  
New York, NY 10001  
+1 212 909 6000

September 7, 2023

BY EMAIL

Philippe Z. Selendy  
SELENDY GAY ELSBERG PLLC  
1290 Sixth Avenue  
New York, NY 10104  
pselendy@selendygay.com

Todd M. Schneider  
SCHNEIDER WALLACE  
COTTRELL KONECKY LLP  
2000 Powell Street  
Emeryville, CA 94608  
tschneider@schneiderwallace.com

**Re:        *In re Tether and Bitfinex Crypto Asset Litig.*,  
            No. 19 Civ. 9236 (KPF) (S.D.N.Y.)**

Dear Philippe:

On behalf of Defendants iFinex Inc., BFXNA Inc., BFXWW Inc., Tether Holdings Limited, Tether Limited, DigFinex Inc., Tether Operations Limited, Tether International Limited, Ludovicus Jan van der Velde and Giancarlo Devasini (collectively, the "B/T Defendants"), we are producing today documents bearing Bates numbers BITFINEX\_TETHER\_1071653 - BITFINEX\_TETHER\_1071656. These documents will be produced via secure file transfer, for which you will receive the necessary access notification.

These documents are being produced in response to Plaintiffs' Requests for Production directed to the B/T Defendants, and pursuant to the B/T Defendants' Responses and Objections thereto. These documents are also being produced pursuant to the Stipulation and Order for the Production and Exchange of Confidential Materials, dated October 27, 2021 (the "Protective Order") and the November 22, 2021 and April 20, 2022 Orders governing the confidentiality of documents involving the Anonymous Trader.

Philippe Selendy

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The documents being produced contain confidential business information and personally identifiable information (“PII”). Fed. R. Civ. P. 5.2 requires that certain categories of information be redacted before a document is publicly filed. Judge Failla’s Individual Rules of Practice reinforce and expand this obligation, and also refer litigants to the E-Government Act of 2002 and the Southern District’s ECF Privacy Policy. Moreover, Section 6 of the Protective Order provides for procedures to be followed in the event that a party seeks to file any document that quotes or divulges Confidential Material or Attorneys’ Eyes Only Material, or seeks to disclose such material during a hearing or trial.

In producing these documents, the B/T Defendants have not knowingly included any documents or information covered by the attorney-client privilege, the work product doctrine, or any other applicable privilege or protection. Any inadvertent production of privileged or work product materials should not be considered a waiver of the relevant protection. Should you identify documents that appear to be privileged or otherwise inadvertently produced during your review, please notify us immediately and cease review of such documents.

If you have any questions regarding the information provided in this letter or the referenced materials, please contact me at 212-909-6821 or [nborn@debevoise.com](mailto:nborn@debevoise.com).

Best regards,

/s/ Natascha Born